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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 29, 2000

BY HAND

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, SW -- Room TW-A325
Washington, D.C. 20554

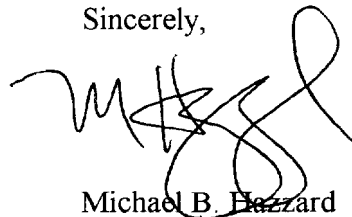
Re: CC Docket No. 99-272

Dear Ms. Salas:

On February 28, 2000, Royce E. Holland and Robert A. McCausland of Allegiance Telecom, Inc. and A. Richard Metzger, Jr. and Michael B. Hazzard of Lawler, Metzger & Milkman, LLC, counsel to Allegiance Telecom, met with Commissioner Michael K. Powell to discuss Allegiance's views on certain issues pending before the Commission in the above-referenced proceeding. Messrs. Holland, McCausland, Metzger, and Hazzard also met with Lawrence E. Strickling and Robert C. Atkinson of the Common Carrier Bureau to discuss Allegiance's views on this matter. Allegiance's position on issues under consideration by the Commission is explained in its comments in the above-referenced proceeding. In addition, a copy of a handout distributed during the meeting is attached hereto.

Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. §1.1206(b)(1), an original and one copy of this letter and enclosure are being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,



Michael B. Hazzard

Enclosure

cc: Commissioner Michael K. Powell
Lawrence E. Strickling
Robert C. Atkinson

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Qwest Pays Price For Rapid Growth

CARRIER STRUGGLES WITH SERVICE PROBLEMS; SOME CUSTOMERS LOOK FOR OTHER OPTIONS

Building a customer base too quickly sometimes can backfire. Take Qwest Communications International Inc., which has gained so many new customers that its network hasn't been able to keep up with demand. In the last two months alone, problems in Qwest's network have resulted in extensive frame relay service slowdowns and circuit outages, the latest spanning 11 days.

The carrier also confirmed customer complaints that circuit setup is taking several weeks, and that space is short in one of its hosting centers.

The problems are the result of Qwest's failure to plan and engineer its network to meet soaring demand for services, says Lisa Pierce, a telecom program manager at Giga Information Group. "Because they're a newer carrier, they've been fixed on promoting themselves," she says. "Their ability to throw money and people at service problems is limited, so they have to plan right the first time. If they fail to service their customers, they won't have to worry about upgrading their network."

One user says poor customer service, long provisioning times, and service in-

AT A GLANCE

QWEST COMMUNICATIONS INTERNATIONAL

FOUNDED: 1994

HEADQUARTERS: Denver

1999 REVENUE: \$3.92 billion

1999 NET INCOME: \$458 million

COMPLETED NATIONAL NETWORK: September 1999

NETWORK DATA: All fiber, IP network comprising 18,500 route miles

NETWORK EXPANSION Added 4,300 route miles in Canada and Mexico in early December 1999

DATA: QWEST

firm, to Qwest, says IT manager John Dogger. The company had been using Qwest's frame relay service to link five U.S. cities. "We're thankfully in the process of converting [to Global Crossing] after 14 months with Qwest," he says.

During an outage last month, Dogger logged more than 50 outages on two circuits. He sent Qwest details on the service shutdowns and requested compensation for not meeting service-level agreements. Dogger hasn't heard from Qwest, but a spokeswoman says Qwest will honor the agreements.

Qwest says the outage was caused by a faulty processor on a Lucent Technologies Inc. frame relay/ATM switch in Los Angeles. For 10 days in late January, an undisclosed number of customers had periodic outages of frame relay connections and service slowdowns. Qwest decided the quickest way to solve the problem was to replace the switch.

Qwest says it doesn't have systematic maintenance or provisioning problems, but is building an all-optical network that will cut setup times by 95% and dramatically reduce network complexity. —BOB WALLACE

terruptions made him switch to Global Crossing Ltd. Low prices, producing \$35,000 to \$40,000 in annual savings, attracted Argents Express Group Ltd., an international shipping-coordination

More on service outages: informationweek.com/773/qwest.htm

Deal Fills Out Compaq's Business-Continuity Offerings

COMPANY FORMS PARTNERSHIP WITH EVERGREEN TO HELP CUSTOMERS SET UP DISASTER-RECOVERY PLANS

Compaq will plug a hole in its business-continuity services this week by establishing a partnership with EverGreen Data Continuity Inc. Under the deal, Compaq will team with EverGreen to help customers set up disaster-recovery plans.

Business-continuity services typically are broken into three phases: planning, implementation, and recovery. Compaq has provided only implementation and recovery in the past. "By offering EverGreen's planning services, we can be a single-source provider for business-continuity services and implementation," says Ed Deary, director of

professional services for Compaq North America.

EverGreen defines and documents procedures for assessing, responding to, and recovering from events that threaten key business operations resulting from application errors, hacking, or natural disasters.

EverGreen will offer Compaq customers a service suite called Information Technology Protection. The suite is broken into three modules that assess

EverGreen develops procedures to handle events that threaten business.

the level of risk data is exposed to and formulate a business-recovery plan, says Steve Burns, EverGreen chief operating officer. Pricing is about \$25,000 for the assessment module, \$25,000 for the planning module, and \$175,000 to \$200,000 for the business-continuity plan. Deary says Com-

paq's business-continuity services then implement remote storage, electronic vaulting, tape libraries, and hot-site alternatives. —LARRY GREENEMEIER

More on disaster recovery: informationweek.com/773/evergreen.htm